

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRYAN ANTHONY REO,)	Case No. 1:18-cv-02359
)	
Plaintiff,)	
)	
v.)	
)	
CHARTER COMMUNICATIONS INC.,)	<u>NOTICE OF REMOVAL</u>
)	
Defendant.)	

Pursuant to 28 U.S.C. § 1441, Defendant Charter Communications, Inc. (“Charter”), files this Notice to remove this action from the Painesville Municipal Court, Painesville, Ohio to this Court. The grounds for the removal are as follows:

1. State Court Action. On September 4, 2018, an action was commenced in the Painesville Municipal Court, Painesville, Ohio, entitled *Bryan Anthony Reo v. Charter Communications Inc.*, Case No. CVI 1801601. A copy of the Complaint is attached as Exhibit 1. A copy of the Municipal Court Docket is attached as Exhibit 2.
2. Timeliness. Defendant was served with the Complaint on September 10, 2018. Removal is timely under 28 U.S.C. § 1446(b).
3. Subject Matter Jurisdiction. Plaintiff asserts claims regarding violations of the Telephone Consumer Protection Act, which is governed by 47 U.S.C. § 227. Because the Complaint asserts claims arising under federal law, removal is proper under 28 U.S.C. § 1441(a).
4. Venue. Plaintiffs brought this action in the Municipal Court of Painesville, Ohio. Pursuant to 28 U.S.C. §§ 115(a)(1), 1441(a), and 1446(a), venue is proper in this Court.

Defendant Charter respectfully requests that this Court assume jurisdiction over this case and issue such further orders as may be necessary and appropriate.

Respectfully submitted,

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/s/ Richard A. Freshwater

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Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Notice of Removal* was sent to the following
by ordinary U.S. Mail, postage prepaid, on this 10th day of October, 2018.

Bryan Anthony Reo
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44060

/s/ Richard A. Freshwater
Richard A. Freshwater

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